

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	Case No. 17-23771-JAD
	:	
BERNARD F. MURPHY, and	:	Chapter 13
JODI M. MURPHY,	:	
Debtors.	:	Related to Doc. No.: 152
	:	
BERNARD F. MURPHY, and	:	Hearing Date: 2/24/2022
JODI M. MURPHY,	:	
Movants,	:	Hearing time: 10:00 AM
	:	
v.	:	
	:	
EDUCATIONAL CREDIT	:	
MANAGEMENT CORPORATION,	:	
Respondent.	:	

**ENTRY OF APPEARANCE AND REQUEST
FOR SERVICE OF PAPERS, RECEIPT OF
NOTICES, AND INCLUSION ON NOTICE LIST**

TO THE CLERK OF THE BANKRUPTCY COURT:

PLEASE TAKE NOTICE that the undersigned law firm is counsel for a party in interest in the above-captioned case, and, pursuant to Bankruptcy Rules 2002 and 9007, our client respectfully requests that all notices given or required to be given in this case and in any adversary proceedings by the Court, the Debtors, any Creditors' Committee, any Trustee, the United States Trustee, any Trustee subsequently appointed, and/or any other party in interest in this case be given to our client and the undersigned counsel at the addresses and to the persons, telephone numbers and telecopier set forth below. This request includes, without limitation, all orders, notices, hearing dates, applications, motions, petitions, pleadings, requests, complaints, demands, replies, answers, schedules of assets and liabilities, statement of affairs, operating reports, plans of reorganization, and disclosure statements, whether formal or informal, whether

written or oral, and whether transmitted or conveyed by mail, courier service, delivery service, telephone, telegraph, telex, telecopier, or otherwise:

Educational Credit Management Corporation
111 South Washington Avenue
Suite 1400
Minneapolis, MN 55401

Attorney and Address:
John M. Quain Jr., Esquire
Barley Snyder, LLP
213 Market Street, 12th Floor
Harrisburg, PA 17101
Telephone No: (717) 231-6603
Email Address: jquain@barley.com

PLEASE TAKE FURTHER NOTICE that client intends that neither this notice of appearance nor any later appearance, pleading, claim or suit shall waive (i) client's rights to have orders in non-core matters entered only after de novo review by a District Judge, (ii) client's right to trial by jury in any proceeding so triable in this case or any other cases, controversies or proceedings related to this case, (iii) client's right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) client's right to have the Bankruptcy Court and the District Court abstain in any matter subject to mandatory or discretionary abstention or (v) any other rights, claims, actions, defenses, set-offs or recoupments to which client is or may be entitled under agreements or in law or in equity, all of which rights, claims, actions, defenses, set-offs and recoupments client expressly reserves.

DATED: February 11, 2022

By: /s/ John M. Quain Jr., Esquire
John M. Quain Jr., Esquire
Court I.D. #311983
213 Market Street, 12th Floor
Harrisburg, PA 17101
(717) 231-6603

I hereby certify that copies of this Entry of Appearance were served February 11, 2022 by ECF notice (electronically) upon:

Attorney for Debtor

Dai Rosenblum
254 New Castle Road, Suite B
Butler, PA 16001

Service was also made by depositing same in the U.S. First Class Mail, postage prepaid, upon:

Chapter 13 Trustee

Ronda J. Winnecour, Esq.
Suite 3250, USX Tower
600 Grant Street
Pittsburgh, PA 15219

U.S. Trustee

Office of the US Trustee
1001 Liberty Avenue, Suite 970
Pittsburgh, PA 15222

Debtor

Bernard and Jodi Murphy
9817 South Tripp Avenue
Oak Lawn, IL 60453